

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

TEMPO NETWORKS, LLC

Plaintiff,

v.

CABLE & WIRELESS JAMAICA LIMITED

Defendant.

Case No. 08-CV-2422 (PKL) (AJP)

MOTION TO ADMIT COUNSEL
PRO HAC VICE

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Richard S. Goldstein, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of


Applicant's Name: Erin H. Fox
Firm Name: White O'Connor Curry LLP
Address: 10100 Santa Monica Boulevard, Suite 2300
City/State/Zip: Los Angeles, California 90067-4008
Phone Number: 310-712-6100
Fax Number: 310-712-6199

Ms. Fox is a member in good standing of the bar of the State of California (see attached certificate of good standing).

There are no pending disciplinary proceedings against Ms. Fox in any State or Federal court.

Dated: March 14, 2008
New York, New York

Respectfully submitted,


Sponsor: Richard S. Goldstein

SDNY Bar: RG-9560
Firm Name: Heller Ehrman LLP
Address: Times Square Tower, 7 Times Square
City/State/Zip: New York, New York 10036
Phone Number: 212-847-8704
Fax Number: 212-763-7600

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U.S. DISTRICT COURT
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

TEMPO NETWORKS, LLC

Plaintiff,

v.

CABLE & WIRELESS JAMAICA LIMITED

Defendant.

Case No. 08-CV-2422 (PKL) (AJP)

**AFFIDAVIT OF RICHARD S. GOLDSTEIN
IN SUPPORT OF MOTION
TO ADMIT COUNSEL
*PRO HAC VICE***

State of New York)
) **ss:**
County of New York)

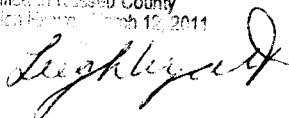
Richard S. Goldstein, being duly sworn, hereby deposes and says as follows:

1. I am a Shareholder of Heller Ehrman LLP, counsel for plaintiff Tempo Networks, LLC in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of plaintiff Tempo Networks, LLC's motion to admit Erin H. Fox as counsel *pro hac vice* to represent plaintiff Tempo Networks, LLC in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in New York in 1995. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Erin H. Fox since 2008.
4. Ms. Fox is associated with White O'Connor Curry LLP, in Los Angeles, California. Plaintiff is a new client of White O'Connor Curry LLP.
5. I believe Ms. Fox to be a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I respectfully move for the admission of Erin H. Fox, *pro hac vice*.
7. I respectfully submit a proposed order granting the admission of Erin H. Fox, *pro hac vice*, which is attached hereto as Exhibit A.

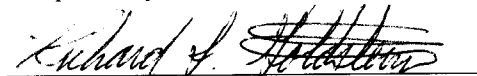
WHEREFORE it is respectfully requested that the motion to admit Erin H. Fox, *pro hac vice*, to represent plaintiff Tempo Networks, LLC in the above captioned matter, be granted.

Dated: March 14, 2008
New York, New York

Notarized: **LEIGH WYATT**
NOTARY PUBLIC, State of New York
No. 01876162365
Qualified in Nassau County
Commission Expires March 12, 2011



Respectfully submitted,



Name of Movant: Richard S. Goldstein

SDNY Bar Code: RG-9560



THE STATE BAR OF CALIFORNIA

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1639

TELEPHONE: 888-800-3400

March 11, 2008

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, ERIN H. FOX, #245633 was admitted to the practice of law in this state by the Supreme Court of California on December 3, 2006; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

A handwritten signature in black ink, appearing to read "Kath Lambert", is written over a horizontal line.

Kath Lambert
Custodian of Membership Records

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

TEMPO NETWORKS, LLC

Plaintiff,

v.

CABLE & WIRELESS JAMAICA LIMITED

Defendant.

Case No. 08-CV-2422 (PKL) (AJP)

**ORDER FOR ADMISSION
PRO HAC VICE
ON WRITTEN MOTION**

Upon the motion of Richard S. Goldstein, attorney for plaintiff Tempo Networks, LLC in the above-captioned case,

IT IS HEREBY ORDERED that

Applicant's Name: Erin H. Fox

Firm Name: White O'Connor Curry LLP

Address: 10100 Santa Monica Boulevard, Suite 2300

City/State/Zip: Los Angeles, California 90067-4008

Telephone/Fax: 310-712-6100/310-712-6199

Email Address: efox@whiteo.com

is admitted to practice *pro hac vice* as counsel for plaintiff Tempo Networks, LLC in the above-captioned cases in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated:
New York, New York

United States District Judge

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

TEMPO NETWORKS, LLC

Plaintiff,

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**MOTION TO ADMIT COUNSEL
*PRO HAC VICE***

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Richard S. Goldstein, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of

Applicant's Name: Andrew M. White
Firm Name: White O'Connor Curry LLP
Address: 10100 Santa Monica Boulevard, Suite 2300
City/State/Zip: Los Angeles, California 90067-4008
Phone Number: 310-712-6100
Fax Number: 310-712-6199

Mr. White is a member in good standing of the bar of the State of California (see attached certificate of good standing).

There are no pending disciplinary proceedings against Mr. White in any State or Federal court.

Dated: March 14, 2008

New York, New York

Respectfully submitted,



Sponsor: Richard S. Goldstein

SDNY Bar: RG-9560
Firm Name: Heller Ehrman LLP
Address: Times Square Tower, 7 Times Square
City/State/Zip: New York, New York 10036
Phone Number: 212-847-8704
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UNITED STATES DISTRICT COURT
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Case No. 08-CV-2422 (PKL) (AJP)

**AFFIDAVIT OF RICHARD S. GOLDSTEIN
IN SUPPORT OF MOTION
TO ADMIT COUNSEL
*PRO HAC VICE***

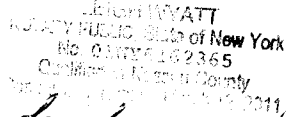
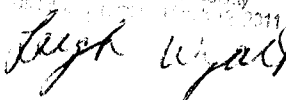
State of New York)
)
County of New York) ss:

Richard S. Goldstein, being duly sworn, hereby deposes and says as follows:

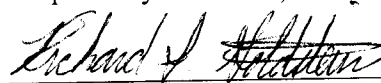
1. I am a Shareholder of Heller Ehrman LLP, counsel for plaintiff Tempo Networks, LLC in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of plaintiff Tempo Networks, LLC's motion to admit Andrew M. White as counsel *pro hac vice* to represent plaintiff Tempo Networks, LLC in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in New York in 1995. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Andrew M. White since 2008.
4. Mr. White is a partner at White O'Connor Curry LLP, in Los Angeles, California. Plaintiff is a new client of White O'Connor Curry LLP.
5. I have found Mr. White to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I respectfully move for the admission of Andrew M. White, *pro hac vice*.
7. I respectfully submit a proposed order granting the admission of Andrew M. White, *pro hac vice*, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Andrew M. White, *pro hac vice*, to represent plaintiff Tempo Networks, LLC in the above captioned matter, be granted.

Dated: March 14, 2008
New York, New York

Notarized: 


Respectfully submitted,



Name of Movant: Richard S. Goldstein

SDNY Bar Code: RG-9560



THE STATE BAR OF CALIFORNIA

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1639

TELEPHONE: 888-800-3400

March 11, 2008

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, ANDREW MILLAR WHITE, #060181 was admitted to the practice of law in this state by the Supreme Court of California on June 18, 1974; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

A handwritten signature in black ink, appearing to read "Kath Lambert", is written over the printed name.

Kath Lambert
Custodian of Membership Records

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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ON WRITTEN MOTION**

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IT IS HEREBY ORDERED that

Applicant's Name: Andrew M. White

Firm Name: White O'Connor Curry LLP

Address: 10100 Santa Monica Boulevard, Suite 2300

City/State/Zip: Los Angeles, California 90067-4008

Telephone/Fax: 310-712-6100/310-712-6199

Email Address: awhite@whiteo.com

is admitted to practice *pro hac vice* as counsel for plaintiff Tempo Networks, LLC in the above-captioned cases in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated:
New York, New York

United States District Judge

**UNITED STATES DISTRICT COURT
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PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Richard S. Goldstein, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of

Applicant's Name: David E. Fink
Firm Name: White O'Connor Curry LLP
Address: 10100 Santa Monica Boulevard, Suite 2300
City/State/Zip: Los Angeles, California 90067-4008
Phone Number: 310-712-6100
Fax Number: 310-712-6199

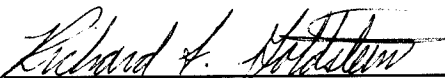
Mr. Fink is a member in good standing of the bar of the State of California (see attached certificate of good standing).

There are no pending disciplinary proceedings against Mr. Fink in any State or Federal court.

Dated: March 14, 2008

New York, New York

Respectfully submitted,



Sponsor: Richard S. Goldstein

SDNY Bar: RG-9560
Firm Name: Heller Ehrman LLP
Address: Times Square Tower, 7 Times Square
City/State/Zip: New York, New York 10036
Phone Number: 212-847-8704
Fax Number: 212-763-7600

UNITED STATES DISTRICT COURT
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**AFFIDAVIT OF RICHARD S. GOLDSTEIN
IN SUPPORT OF MOTION
TO ADMIT COUNSEL
*PRO HAC VICE***

State of New York)
)
County of New York) **ss:**

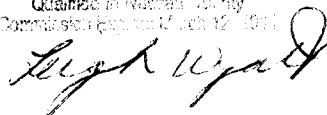
Richard S. Goldstein, being duly sworn, hereby deposes and says as follows:

1. I am a Shareholder of Heller Ehrman LLP, counsel for plaintiff Tempo Networks, LLC in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of plaintiff Tempo Networks, LLC's motion to admit David E. Fink as counsel *pro hac vice* to represent plaintiff Tempo Networks, LLC in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in New York in 1995. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known David E. Fink since 2008.
4. Mr. Fink is a partner at White O'Connor Curry LLP, in Los Angeles, California. Plaintiff is a new client of White O'Connor Curry LLP.
5. I have found Mr. Fink to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I respectfully move for the admission of David E. Fink, *pro hac vice*.
7. I respectfully submit a proposed order granting the admission of David E. Fink, *pro hac vice*, which is attached hereto as Exhibit A.

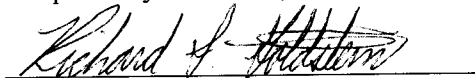
WHEREFORE it is respectfully requested that the motion to admit David E. Fink, *pro hac vice*, to represent plaintiff Tempo Networks, LLC in the above captioned matter, be granted.

Dated: March 14, 2008
New York, New York

Notarized: **LEIGH WAGG**
NOTARY PUBLIC, State of New York
No. 01896102365
Qualified in Nassau County
Commission Expires March 12, 2011



Respectfully submitted,



Name of Movant: Richard S. Goldstein

SDNY Bar Code: RG-9560



THE STATE BAR OF CALIFORNIA

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1639

TELEPHONE: 888-800-3400

March 11, 2008

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, DAVID EDWARD FINK, #169212 was admitted to the practice of law in this state by the Supreme Court of California on December 13, 1993; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

Kath Lambert
Custodian of Membership Records

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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Plaintiff,

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CABLE & WIRELESS JAMAICA LIMITED

Defendant.

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ON WRITTEN MOTION**

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IT IS HEREBY ORDERED that

Applicant's Name: David E. Fink

Firm Name: White O'Connor Curry LLP

Address: 10100 Santa Monica Boulevard, Suite 2300

City/State/Zip: Los Angeles, California 90067-4008

Telephone/Fax: 310-712-6100/310-712-6199

Email Address: dfink@whiteo.com

is admitted to practice *pro hac vice* as counsel for plaintiff Tempo Networks, LLC in the above-captioned cases in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated:
New York, New York

United States District Judge

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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Plaintiff,

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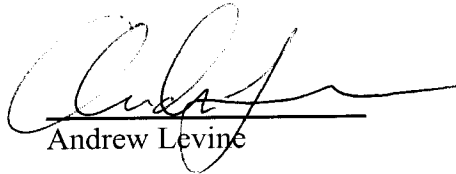
Case No. 08-CV-2422 (PKL) (AJP)

CERTIFICATE OF SERVICE

I, Andrew Levine, an attorney, hereby certify that, on the 14th day of March 2008, I caused true and correct copies of plaintiff Tempo Network, LLC's Motions to Admit Counsel *Pro Hac Vice*, Affidavits of Richard S. Goldstein in Support of Motions to Admit Counsel *Pro Hac Vice*, and Proposed Orders for Admission *Pro Hac Vice* on Written Motion in the above captioned case to be served on defendant Cable & Wireless Jamaica Limited's counsel listed below by Federal Express:

Gregory P. Joseph
Jeffrey H. Zaiger
Gregory P. Joseph Law Offices LLC
485 Lexington Avenue
New York, New York 10017
Telephone: (212) 407-1200
Facsimile: (212) 407-1299

Dated: New York, New York
March 14, 2008



Andrew Levine